# EXHIBIT 11 FILED UNDER SEAL

### CASE 0:16-cv-01054-DTS Doc. 820 Filed 10/28/20 Page 2 of 9

		Page
	UNITED STATES	S DISTRICT COURT
	DISTRICT (	OF MINNESOTA
FAIR ISAAC	CORPORATION, a	)
Delaware c	orporation,	)
		)
	Plaintiff,	)
		)
vs.		) Case No.:
		) 16-CV-1054 (WMW/DTS)
FEDERAL IN	SURANCE COMPANY,	, )
an Indiana	corporation, ar	ıd )
ACE AMERIC	AN INSURANCE	)
COMPANY, a	Pennsylvania	)
corporation	n,	)
		)
	Defendants.	)
	HIGHLY CO	ONFIDENTIAL
	ATTORNEYS	S' EYES ONLY
	VIDEOTAPED	DEPOSITION OF
	CHASE	McCARTHY
	04/23/2020	
	9:30 a.m.	
PLACE:		
	Bridgewater, N	New Jersey 08807
REPORTED		Johnson, RDR, CRR, CRC, RS
		eoconference)
JOB NO.:	MW4024408	)

Page 58  A. That's what it was. It was used by ACE  agents.  Q. Do you know, was this project accomplished? A. I believe it was.  D. Do you know, was this project accomplished? A. I believe it was.  M. Felceinn's the folder and exhibit titled Pandey 283. If you could open that up.  MR. FLEMING: Where did you say that was, Heathbits folder.  MR. FLEMING: Where did you say that was, Heathbits folder.  MR. FLEMING: Okay.  MR. FLEMING: Okay.  MR. FLEMING: Okay.  A. (Reviewing document.) Okay.  Q. Ard McCarthy, have you seen this email and 15 its attachment before?  A. (Reviewing document.)  MR. FLEMING: I thought I had gone  blind.  D. Vou're done with this document, leguesty ACE  underwriters allowed to use the CUW interface?  A. Not that I recall. No.  Q. For the CUW application, is that application?  A. Not that I recall. No.  Q. Do you know if underwriters were the CUW  application?  MR. FLEMING: I thought I had gone  business requirements document that's attached to this email for the project name titled "CUW-IM  Page 59  A. No.  A. Not that I recall. No.  Q. For the CUW application, is that application?  A. Yes.  Q. On you know if underwriters employed by?  A. Could you bave any involvement in that project?  A. Could you be more specific with your aquestion?  Q. On you know if underwriters employed by?  A. Could you be more specific with your question.  Q. And who were the underwriters employed by?  A. Could you be more specific with your question?  Q. And before the merger, legacy Chubb  MR. FLEMING: Heather, when you're done with this document, I guess?  MR. FLEMING: Heather, when you're done with this document, I guess?  MR. FLEMING: Heather, when you're done with this document, I guess?  MR. FLEMING: Heather, when you're done with this document, I guess?  MR. KILEBENSTEIN:  MR. Could you be mor				
2 legacy ACE underwriters given access to the CUW 3 Q. Do you know, was this project accomplished? 4 A. I believe it was. 5 Q. If you'll go to the folder titled "!!Marked Exhibits". They placed into that folder an exhibit titled Pandey 283. If you could open that up. 8 MR. FLEMING: Where did you say that was, Heather? 10 MS. K.LLEBENSTEIN: I put it in the 11 Marked Exhibits folder. 11 MR. FLEMING: Okay. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and its attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to to this email for the project name titled "CUW-IM"  Page 39 1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that project? 5 Q. Vou've any for the CUW application is that application used by underwriters or agents? 8 A. It's — CUW is a broad application. I wouldn't be able to answer that definitively. 9 Q. Do you know if underwriters are employed by Chubb. 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters and project one with the cumderwriters are mentioned to the cum application? 17 A. Could you be more specific with your aused the cumderwriters employed by Chubb. 18 Q. And who were the underwriters employed by Chubb. 19 Q. The CUW application existed before the cumderwriters, only, used the application, correct? 24 A. Pres. 25 Q. And before the merger, legacy Chubb underwriters, only, used the application, correct? 26 A. There's a CUW application. I wouldn't be able to answer that definitively. 27 Q. Do you know if any legacy ACE underwriters. 28 Q. Are the merger were legacy ACE underwriters. 29 Q. And who were the underwriters were the cumderwriters were the cumderwriters and proje				
3 Q. Do you know, was this project accomplished? 4 A. I believe it was. 5 Q. If you'll go to the folder titled "!!Marked 6 Exhibits," I've placed into that folder an exhibit to titled Pandey 283. If you could open that up. 8 MR. FLEMING: Where did you say that 9 was, Heather? 10 MS. KLIEBENSTEIN: I put it in the 11 Marked Exhibits folder. 11 Marked Exhibits folder. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and it is attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to this email for the project name titled "CUW-IM 25 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 3 A. No. To that I recall. No. 4 Q. For the CUW application, is that application? 4 A. Chubb underwriters or agents? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that application? 10 Q. Do you know if underwriters use the CUW application? 11 A. Yes. 12 Q. And who were the underwriters employed by Chubb. 13 Q. Drid CUW application? 14 A. Could you be more specific with your question? 15 Q. And who were the underwriters employed by Chubb. 16 Q. The CUW application existed before the 20 merger, correct? 17 A. Could you be more specific with your question? 18 Q. And before the merger, legacy Chubb 20 underwriters, only, used the application, correct? 19 Q. The CUW application, cysted the application, correct? 20 A. I don how famy legacy ACE underwriters is the CUW application? 21 A. Pes. 22 Q. And before the merger, legacy Chubb 21 underwriters, only, used the application, correct? 23 A. I'm not sure they're the only people that			1	
4 A. I bouldn't know if they were given access.  5 Q. If you'll go to the folder titled "!!Marked 6 Exhibits," I've placed into that folder an exhibit 7 titled Pandey 283. If you could open that up. 8 MR. FLEMING: Where did you say that 9 was, Heather? 10 MS. K.LIEBENSTEIN: I put it in the 11 Marked Exhibits folder. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 A. I don't recall seeing this. 15 Q. Vor're listed on this email chain, correct? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actally, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 39 2 A. No. 3 Q. Did you have any involvement in that 4 project? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 4 A. It's - CUW application, is that 5 application used by underwriters use the CUW application? 5 Q. And who were the underwriters employed by Chubb. 10 Q. Do you know if underwriters employed by Chubb. 11 Q. The CUW application existed before the 12 used the CUW application, cystel the merger, legacy Chubb 2 underwriters, only, used the application, correct? 2 A. Porre using the term "portal," and that 3 doesn't - I don't understand the way that you're 3 aking the question. 3 Q. After the merger, were legacy ACE 4 A. I don't see my name. 4 Project? 5 A. I don't see my name. 5 I'm had to they interface with? 6 A. There's a CUW interface with? 7 A. I don't see my name. 7 A. I don't see my name. 8 Q. Air don't see my name. 9 Well and the the underwriters we with and that of the project with see and the way that you're 9 doesn't - I don't understand the awy that you're 9 doesn't - I don't understand the way that you're 9 doesn't - I don't understand the way that you're 9 doesn't - I don't understand the way that you're 9 doesn't - I don't understand the way that you'			2	
5 Q. Maybe I asked that question wrong. I don't mean access to the underlying application, I mean the portal that the undervriters used the Mr. FLEMING: Where did you say that was, Heather?  10 MS. KLIEBENSTEIN: I put it in the Marked Exhibits folder.  11 Marked Exhibits folder.  12 MR. FLEMING: Okay.  13 A. (Reviewing document.) Okay.  14 Q. Mr. McCarthy, have you seen this email and it is attachment before?  15 A. I don't recall seeing this.  17 Q. You're listed on this email chain, correct?  18 A. Reviewing document.)  19 Q. Actually, I don't think you are.  20 A. I don't see my name.  21 MR. FLEMING: I thought I had gone 22 blind.  22 blind.  23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  19 Q. Did you have any involvement in that 4 project?  10 A. Not that I recall. No.  11 Q. Do you know if underwriters use the CUW application, is that application used by underwriters use the CUW application. I wouldn't be able to answer that definitively.  10 Q. Do you know if underwriters employed by?  11 A. Chubb underwriters are employed by Chubb.  22 Q. And who were the underwriters employed by Chubb.  23 Q. And who were the underwriters employed by Chubb.  24 Q. Dro you know if underwriters employed by Chubb.  25 Q. Doy ou know if underwriters employed by Chubb.  26 Q. Dro you know if any legacy ACE underwriters in the project mane titled "CUW-IM"  17 A. Could you be more specific with your a used the CUW application emacks be completed in the project mane titled "CUW-IM"  18 question?  19 Q. Actually, I don't think you are.  20 A. No.  3 Q. Did you have any involvement in that 4 project?  4 A. No.  3 Q. Did you have any involvement in that 4 project?  4 A. No.  4 THE VIDEOGRAPHER: We are back on the 5 record. This is the start to Media No. 3. The time is 11:58.  3 Q. Mr. McCarthy, in the control of page 5, top of 1 page 6.  4 C. Ricker the morger, legacy Chubb 2 underwriters, only, used the application, correct?				* *
6 Exhibits," Twe placed into that folder an exhibit titled Pandey 283. If you could open that up. 8 MR. FLEMING: Where did you say that 9 was, Heather? 10 MS. KLIEBENSTEIN: I put it in the 11 Marked Exhibits folder. 11 Marked Exhibits folder. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and 15 its attachment before? 15 its attachment before? 16 A. I don't recall seeing this. 17 Q. Vou're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: Okay. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 25 business requirements document that's attached to this email for the project name titled "CUW-IM" 25 Support for ACE Processing"? 26 A. No. 27 Q. Did you have any involvement in that 4 project? 28 A. No. 39 Q. Did you have any involvement in that 4 project? 40 A. It's - CUW is a broad application, is that application used by underwriters or agents? 41 A. Chubb underwriters are employed by? 42 A. Chubb underwriters are employed by? 43 A. Chubb underwriters are employed by? 44 A. Chubb underwriters are employed by? 45 Q. Do you know if any legacy ACE underwriters to my legacy ACE underwriters and placition? 46 Q. The CUW application? 47 A. Could you be more specific with your question? 48 Q. And before the emerger, legacy Chubb and an object that the underwriters and the way that you're done with? 49 Q. The CUW application oxisted before the merger, correct? 40 A. I don't seem y mane. 41 A. (Project and the way that you're done with this document, 1 guess? 41 A. No. 42 The VIDEOGRAPHER: We're going off the record. The time is 11:58. 43 (A break was taken at 11:59 a.m.) 44 THE VIDEOGRAPHER: We're poing off the record. The time is 11:58. 45 Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures? 46 A. The CUW application? 47 A. Could you be more specific with your question? 48 Q. And before the merger, legacy Chubb				
7 titled Pandey 283. If you could open that up. 8 MR. FLEMING: Where did you say that was, Heather? 10 MS. K.LIBEENSTEIN: I put it in the 11 Marked Exhibits folder. 11 MR. FLEMING: Okay. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and it is attachment before? 16 A. I don't recall seeing this. 17 Q. Vor're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to business requirements document that's attached to 25 this email for the project name titled "CUW-IM" 25 Upoport for ACE Processing"? 26 A. No. 27 Q. Did you have any involvement in that 4 project? 28 A. It's – CUW is a broad application. I wouldn't be able to answer that definitely. 29 Q. Do you know if underwriters use the CUW application used by underwriters use the CUW application. I wouldn't be able to answer that definitely. 29 Q. Do you know if underwriters we the CUW application is that application? 20 Q. Do you know if underwriters we the CUW application. I wouldn't be able to answer that definitely. 21 Q. A. Chubb underwriters are employed by? 1A. Chubb unde				· · · · · · · · · · · · · · · · · · ·
8 MR. FLEMING: Where did you say that 9 was, Heather? 10 Ms. KLIEBENSTEIN: I put it in the 11 Marked Exhibits folder. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q Mr. McCarthy, have you seen this email and 15 its attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  The subject of the first of the project name titled "CUW-IM"  Page 59 1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's - CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if legacy McE underwriters 10 used the CUW application? 11 A. (Nout understand the way that you're 11 doesn't - I don't understand the way that you're 12 asking the question. 13 Q. Pla ask it a different way. 14 When underwriters use the CUW interface with? 16 A. There's a CUW interface with? 16 A. There's a CUW interface with? 17 and that 18 doesn't - I don't understand the way that you're 19 acking the question. 19 Q. Arie ask it a different way. 10 A. (Reviewing document.) 11 doesn't - I don't understand the way that you're 11 doesn't - I don't understand the way that you're 12 asking the question. 13 Q. Pla ask it a different way. 14 When underwriters use the CUW interface with? 16 A. There's a CuW interface with? 16 A. Ther's a CUW interface with? 16 A. I don't see my name. 17 A. Ron of twow. I do not know. 18 Q. After the merger, were legacy ACE 20 A. I do not know. I do not know. 21 Underwriters underwork the w		-	6	
9 CUW portal after the merger? 10 MS. KLIEBENSTEIN: I put it in the 11 Marked Exhibits folder. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and its attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to this email for the project name titled "CUW-IM" 25 A. No. 26 Q. Did you have any involvement in that 4 project? 27 A. No. that I recall. No. 28 Q. Did you have any involvement in that 4 application, is that application used by underwriters or agents? 29 A. Yes. 20 Q. Do you know if underwriters use the CUW application. I wouldn't be able to answer that definitively. 21 A. Yes. 22 Q. Do you know if any legacy ACE underwriters used the CUW application existed before the merger, correct? 23 Q. Prom what applications? 24 MS. KLIEBENSTEIN: Yeah. I think I'm done with this case, have you assisted in pulling any gross written premium figures? 24 MS. KLIEBENSTEIN: 25 Q. Do you know if any legacy ACE underwriters in premium figures? 26 Q. Form what applications? 27 A. Could you be more specific with your question? 28 Q. Ar Have it pean that definitively. 39 Q. The CUW application existed before the merger, correct? 30 Q. And before the merger, legacy Chubb and correct? 31 A. Yes. 32 Q. And before the merger, legacy Chubb and and learn the merger? 39 Q. The CUW application existed before the merger, or merce? 39 Q. And before the merger, legacy Chubb and and learn the marked Exhibits a document titled Phillips 566. Let me know when you turning to page - the bottom of page 5, top of page 6. 30 Q. And before the emptyre, legacy Chubb and control page 5, top of page 6. 31 Q. And looking at the bottom of page 5, top of page 6. 32 Q. And before the merger, legacy Chubb and control page 5,			7	•
10 Ms, KLIEBENSTEIN: I put it in the   11 Marked Exhibits folder.   11 doesn't — I don't understand the way that you're   12 asking the question.   13 A. (Reviewing document.) Okay.   13 A. (Reviewing document.) Okay.   14 Q. Mr. McCarthy, have you seen this email and it its attachment before?   16 A. I don't recall seeing this.   17 Q. Vou're listed on this email chain, correct?   18 A. (Reviewing document.)   18 A. (Reviewing document.)   19 Q. Actually, I don't think you are.   19 Q. Actually, I don't think you are.   10 A. I don't see my name.   10 Ms. FLEMING: I thought I had gone   10 bilind.   10 bil				
11 Marked Exhibits folder. 12 MR. FLEMING: Okay. 13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and 15 its attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 2 blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  19 Support for ACE Processing"? 20 A. No. 31 Q. Did you have any involvement in that 4 project? 4 Project? 4 A. No. 4 Project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 3 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 4 application? 10 Q. Do you know if underwriters use the CUW application. I 4 application? 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters in used by underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters in used the CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 24 A. I'm not sure they're the only people that 25 A. I'm not sure they're the only people that 26 A. I'm not sure they're the only people that 24 projecf, and looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the		,		· ·
12				
13 A. (Reviewing document.) Okay. 14 Q. Mr. McCarthy, have you seen this email and it its attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM" 25 blind. 26 Q. Did you have any involvement in that 4 project? 27 A. No. 28 A. Not that I recall. No. 39 Q. Did you have any involvement in that 4 project? 40 A. I'd not know I do not know. 40 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 41 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 42 Q. Do you know if underwriters or agents? 43 Q. And who were the underwriters use the CUW application. I wouldn't be able to answer that definitively. 44 Q. Do you know if any legacy ACE underwriters used the CUW application? 45 A. Could you be more specific with your question? 46 Q. Do you know if any legacy ACE underwriters used the CUW application existed before the 2 merger, correct? 47 A. Could you be more specific with your question? 48 Q. And before the merger, legacy Chubb 2 underwriters, only, used the application, correct? 49 A. I'm not sure they're the only people that				· · · · · · · · · · · · · · · · · · ·
14 Q. Mr. McCarthy, have you seen this email and 15 its attachment before? 15 (A. I don't recall seeing this. 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM" 25 Land No. 26 Q. Did you have any involvement in that 4 project? 27 A. No. 28 A. Not that I recall. No. 29 Q. Did you have any involvement in that 4 project? 20 A. I don't see my name. 21 I Support for ACE Processing"? 22 A. No. 33 Q. Did you have any involvement in that 4 project? 24 A. No that I recall. No. 25 A. Not that I recall. No. 26 Q. For the CUW application, is that 7 application used by underwriters or agents? 28 A. It's - CUW is a broad application. I 9 wouldn't be able to answer that definitively. 29 Q. Do you know if underwriters use the CUW 11 application? 20 Q. Do you know if any legacy ACE underwriters in used the CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 20 underwriters, only, used the application, correct? 21 A. Yes. 24 Q. And before the merger, legacy Chubb 21 A. I'm not sure they're the only people that 4 Cuw application, correct? 24 A. I'm not sure they're the only people that 5 when underwriters use the the CUW application existed before the 24 the current of the project not such the CUW application, correct? 25 A. I'm not sure they're the only people that 5 when underwriters use the the CUW application, correct? 25 A. No that I recall. No. 26 Co. And looking at the bottom of page 5, top of page 6.		•		
15 its attachment before? 16 A. I don't recall seeing this. 17 Q. You're listed on this email chain, correct? 18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone blind. 22 blind. 23 Q. Mr. McCarthy, are you familiar with the business requirements document that's attached to this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that project? 4 A. No that I recall. No. 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that application used by underwriters or agents? 8 A. It's – CUW is a broad application. I wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW application? 21 A. Yes. 22 Q. And who were the underwriters employed by? 23 Q. Dro you know if any legacy ACE underwriters used the CUW application existed before the merger, correct? 24 A. Yes. 25 Q. And before the merger, legacy Chubb 20 and writers, only, used the application, correct? 26 A. I'm not sure they're the only people that 27 what do they interface a CUW interface that they would access. 28 Q. After the merger, were legacy ACE underwriters allowed to use the CUW interface? 29 A. I do not know.				
16 A. I don't recall seeing this.  Q. You're listed on this email chain, correct?  A. (Reviewing document.)  Q. Actually, I don't think you are.  19 Q. Actually, I don't think you are.  20 A. I don't see my name.  21 MR. FLEMING: I thought I had gone  22 blind.  23 Q. Mr. McCarthy, are you familiar with the  24 business requirements document that's attached to  25 this email for the project name titled "CUW-IM"  Page 59  Support for ACE Processing"?  A. No.  Q. Did you have any involvement in that  project?  A. Not that I recall. No.  Q. For the CUW application, is that  application used by underwriters or agents?  A. A' F CUW is a broad application. I  wouldn't be able to answer that definitively.  Q. Do you know if underwriters use the CUW  application?  A. Could you be more specific with your  (used the CUW application existed before the underwriters, only, used the application, correct?  A. Yes.  Q. Actually, I don't think you are.  19 underwriters allowed to use the CUW interface?  A. I do not know. I do not know.  MR. FLEMING: Heather, when you're done with this document, I guess?  MS. KLIEBENSTEIN: Yeah. I think I'm  25 this email for the project name titled "CUW-IM  26 this email for the project name titled "CUW-IM  27 THE VIDEOGRAPHER: We're going off the record. This is the start to Media No. 3. The record. This is the start to Media No. 3. The time is 11:58 a.m.)  MR. FLEMING: Heather, when you're done with this document, I guess?  MS. KLIEBENSTEIN: Yeah. I think I'm  27 THE VIDEOGRAPHER: We're going off the record. The time is 11:58 a.m.)  MR. FLEMING: Heather, when you're done with this document, I guess?  MS. KLIEBENSTEIN: Yeah. I think I'm  28 (A break was taken at II:58 a.m.)  MR. FLEMING: Heather, when you're done with this document, I guess?  MS. KLIEBENSTEIN: Veah. I think I'm  Mone with that. I think we can take a bunch break.  THE VIDEOGRAPHER: We're going off the record. This is the start to Media No. 3. The time is 1:0-4.  Page 61  THE VIDEOGRAPHER: We're going off the record. This is				<del></del>
17 access.  A. (Reviewing document.)  A. (Reviewing document.)  9 A. (I don't see my name.  20 A. I don't see my name.  21 MR. FLEMING: I thought I had gone  22 blind.  23 Q. Mr. McCarthy, are you familiar with the  24 business requirements document that's attached to  25 this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"?  2 A. No.  3 Q. Did you have any involvement in that  4 project?  A. Not that I recall. No.  6 Q. For the CUW application, is that  7 application used by underwriters or agents?  8 A. It's CUW is a broad application. I  9 wouldn't be able to answer that definitively.  10 Q. Do you know if underwriters use the CUW  11 application?  2 A. Yes.  3 Q. And who were the underwriters employed by Chubb.  4 Q. Do you know if any legacy ACE underwriters to used the CUW application existed before the  10 question?  11 A. Yes.  12 Q. And before the merger, were legacy ACE  12 underwriters allowed to use the CUW interface?  A. I don't see my name.  20 A. I don't know. I do not know.  4 Wh. FLEMING: Heather, when you're done with this document, I guess?  4 MS. KLIEBENSTEIN: Yeah. I think I'm done with this document, I guess?  4 MS. KLIEBENSTEIR: Yeah. I think I'm done with this document, I guess?  5 THE VIDEOGRAPHER: We're going off the creord. The time is 11:58 a.m.)  7 THE VIDEOGRAPHER: We're going off the time is 1:04.  8 THE VIDEOGRAPHER: We're going off the time is 1:04.  9 Wh. KLIEBENSTEIN: Yeah. I think I'm done with this document, I guess?  1 THE VIDEOGRAPHER: We're going off the time is 1:1:58 a.m.)  1 THE VIDEOGRAPHER: We're going off the time is 1:04.  1 THE VIDEOGRAPHER: We're going off the time is 1:04.  2 Page 61  3 (A break was taken at 11:58 a.m.)  4 THE VIDEOGRAPHER: We're going off the time is 1:04.  5 record. The time is 11:58.  9 Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written promium figures?  1 A. Yes.  2 Q. From What applications?  1 A. I dan't have it open. I'm just looking at it quickly.  9 Q. Sure				•
18 A. (Reviewing document.) 19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 59 1 Support for ACE Processing"? 2 A. No. 2 Did you have any involvement in that 4 project? 3 Q. Did you have any involvement in that 4 project? 4 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by Chubb. 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters to the CUW application existed before the 16 used the CUW application existed before the 17 and before the merger, legacy Chubb 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters allowed to use the CUW interface? 24 A. I do not know. I do not know. 25 MR. FLEMING: Heather, when you're done with this document it den with this question, could we take a lunch break 26 with this question, could we take a lunch break 27 When you're done with this document, I guess? 28 MS. KLIEBENSTEIN: Yeah. I think I'm 29 C. Mr. MCCarthy, in connection with this case, have you assisted in pulling any gross written 29 premium figures? 20 Q. From what applications? 31 Q. Do you know if any legacy ACE underwriters in the definitively. 32 Q. From what applications? 33 Q. The CUW application existed before the 34 mercord. The time is 11:58 a.m.) 35 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 4 record. The time is 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 5 record. The time is 11:58 a.m.) 6 Q. Mr. McCarthy, in connection with this case, have you assi		<u> </u>		
19 Q. Actually, I don't think you are. 20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters used the CUW application? 16 used the CUW application existed before the 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters allowed to use the CUW interface? 24 A. I do not know. I do not know. 25 MR. FLEMING: Heather, when you're done 26 WR. FLEMING: Heather, when you're done with this document, I guess? 24 When you're done with this document, I guess? 25 MS. KLIEBENSTEIN: Yeah. I think I'm 26 done with that. I think we can take a lunch break. 27 MS. KLIEBENSTEIN: Yeah. I think I'm 28 done with that. I think we can take a lunch break. 28 MS. KLIEBENSTEIN: Veal. I think I'm 29 (A break was taken at 11:58 a.m.) 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 4 time is 1:04. 7 BY MS. KLIEBENSTEIN: 8 Q. Mr. McCarthy, in connection with this case, 9 have you assisted in pulling any gross written 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. Lave it open. I'm just looking at it questi				
20 A. I don't see my name. 21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 4 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 25 with this question, and RR. FLEMING: Heather, when you're done with this document, I guess? 24 with this question, could we take a lunch break when you're done with this document, I guess? 25 MS. KLIEBENSTEIN: Yeah. I think I'm 26 when you're done with this document, I guess? 26 MS. KLIEBENSTEIN: Yeah. I think I'm 27 THE VIDEOGRAPHER: We're going off the record. The time is 11:58 a.m.) 28 (A break was taken at 11:58 a.m.) 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We are back on the time is 1:04. 5 (A break was taken at 11:58 a.m.) 6 (B by MS. KLIEBENSTEIN: Yeah. I think I'm 6 this email for the project name titled Pillips to A. Yes. 14 (A break was taken at 11:58 a.m.) 7 HEVIDEOGRAPHER: We're going off the record. The time is 11:58. 8 (A lt's CUW is a broad application. I who are the we're going off the record. The time is 11:58. 9 Wouldn't be able to answer that definitively. 16 (a break was taken at 11:58 a.m.) 17 HE VIDEOGRAPHER: We're going off the time		,		
21 MR. FLEMING: I thought I had gone 22 blind. 23 Q. Mr. McCarthy, are you familiar with the 23 business requirements document that's attached to 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's - CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application existed before the 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that  25 with this question, could we take a lunch break when you're done with this document, I guess? when you're done with this document, it guestion, could we take a lunch break when you're done with this document, it guestion when you're done with this document, it guestion when you're done with this document, it guestion when you're done with this document, it guests  Page 61  THE VIDEOGRAPHER: We're going off the record. The time is 11:58 a.m.)  4 THE VIDEOGRAPHER: We're going off the record. This is the start to Media No. 3. The time is 1:04.  7 BY MS. KLIEBENSTEIN:  8 Q. Mr. McCarthy, in connection with this case,  9 have you assisted in pulling any gross written  10 premium figures?  11 A. Yes. 12 Q. From what applications?  A. I'm could you be more specific with your 14 question?  15 A. I'm premium figures?  16 used the CUW application existed before the merger, correct?  21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 und				
22 blind. 23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 4 A. No that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 with this question, could we take a lunch break 23 when you're done with this document, I guess? 24 MS. KLIEBENSTEIN: Yeah. I think I'm 25 done with that. I think we can take a lunch break 26 when you're done with this document, I guess? 27 MS. KLIEBENSTEIN: Yeah. I think I'm 28 done with that. I think we can take a lunch break 29 the view in that. I think we can take a lunch break. 20 Page 61  THE VIDEOGRAPHER: We're going off the 21 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We are back on the 24 record. This is the start to Media No. 3. The 25 time is 1:04. 26 page 62  THE VIDEOGRAPHER: We're going off the 27 record. This time is 1:04. 28 PYMS. KLIEBENSTEIN: 29 Q. Mr. McCarthy, in connection with this case, 3 have you assisted in pulling any gross written 30 Q. Mr. McCarthy, in connection with this case, 4 Pyes. 31 A. Yes. 32 Q. From what applications? 33 A. From IRMA, TAPS, and for CUW-IM. 4 Q. I've moved into the Marked Exhibits a 4 Gould with that. I think we can take a lunch break. 4 THE VIDEOGRAPHER: We're going off the 4 THE VIDEOGRAPHER: We're going off the 4 THE VIDEOGRAPHER: We're going off the 4 THE VIDEOGRAPHER: We're going of		•		
23 Q. Mr. McCarthy, are you familiar with the 24 business requirements document that's attached to 25 this email for the project name titled "CUW-IM"  Page 59  Page 59  Page 61  Support for ACE Processing"?  A. No.  Q. Did you have any involvement in that 4 project?  A. Not that I recall. No.  Q. For the CUW application, is that 4 application?  A. Yes.  Q. Do you know if underwriters use the CUW 11 application?  A. Chubb underwriters are employed by Chubb. Q. Do you know if any legacy ACE underwriters to used the CUW application?  A. Could you be more specific with your 18 question?  Q. The CUW application existed before the 20 merger, correct?  A. Yes.  21 Q. And before the merger, legacy Chubb 22 underwriters, only, used the application, correct?  24 A. I'm not sure they're the only people that  Page 59  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  MS. KLIEBENSTEIN: Yeah. I think I'm done with that. I think we can take a lunch break.  Page 61  THE VIDEOGRAPHER: We're going off the record. This is the start to Media No. 3. The time is 11:58.  A. A break.  A. A break.  A. By MS. KLIEBENSTEIN:  A. Yes.  D. War MS. KLIEBENSTEI				· · · · · · · · · · · · · · · · · · ·
24 business requirements document that's attached to this email for the project name titled "CUW-IM"  Page 59  1 Support for ACE Processing"?  2 A. No.  3 Q. Did you have any involvement in that project?  5 A. Not that I recall. No.  6 Q. For the CUW application, is that application used by underwriters or agents?  8 A. It's CUW is a broad application. I youldn't be able to answer that definitively.  10 Q. Do you know if underwriters use the CUW application?  12 A. Yes.  13 Q. And who were the underwriters employed by?  14 A. Couldb underwriters are employed by Chubb.  15 Q. Do you know if any legacy ACE underwriters to used the CUW application?  16 A. Could you be more specific with your question?  17 A. Could you be more specific with your question?  18 Q. And before the merger, legacy Chubb underwriters, only, used the application, correct?  20 Q. And before the merger, legacy Chubb underwriters, only, used the application, correct?  21 A. I'm not sure they're the only people that  22 MS. KLIEBENSTEIN: Yeah. I think we can take a lunch break.  Page 61  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We are back on the time is 1:04.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  THE VIDEOGRAPHER: We're going off the record. The time is 11:				-
Page 59 1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 19 merger, correct? 20 A. Yes. 21 Q. And before the merger, legacy Chubb 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that  Page 59  Page 61  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off the record. The time is 11:58.  (A break was taken at 11:58 a.m)  THE VIDEOGRAPHER: We're going off t				· · · · · · · · · · · · · · · · · · ·
Page 59 1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 19 Q. Sure. Take your time. And I'm going to be 10 underwriters, only, used the application, correct? 20 And before the merger, legacy Chubb 21 A. Yes. 22 Q. And looking at the bottom of page 5, top of 24 A. I'm not sure they're the only people that 2 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're beach on the		<u> -</u>		
1 Support for ACE Processing"? 2 A. No. 3 Q. Did you have any involvement in that 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We're going off the 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We are back on the 5 record. This is the start to Media No. 3. The 6 time is 1:04. 7 BY MS. KLIEBENSTEIN: 8 Q. Mr. McCarthy, in connection with this case, 9 have you assisted in pulling any gross written 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page — the bottom of page 5, top of 21 page 6. 22 A. (Reviewing document.) Okay. 23 Q. And looking at the bottom of page 5, top of 24 A. I'm not sure they're the only people that	25	this email for the project name titled "COW-IM	25	done with that. I think we can take a lunch break.
2 record. The time is 11:58. 3 Q. Did you have any involvement in that 4 project? 5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 21 Q. Sure. Take your time. And I'm going to be 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 2 record. The time is 11:58. 3 (A break was taken at 11:58 a.m.) 4 THE VIDEOGRAPHER: We are back on the 7 record. This is the start to Media No. 3. The 6 time is 1:04. 7 BY MS. KLIEBENSTEIN: 8 Q. Mr. McCarthy, in connection with this case, 9 have you assisted in pulling any gross written 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 A. Yes. 22 Q. And looking at the bottom of page 5, top of 23 Q. And looking at the bottom of page 5, top of 24 A. I'm not sure they're the only people that		=		
Q. Did you have any involvement in that project? A. Not that I recall. No. Q. For the CUW application, is that application used by underwriters or agents? A. It's CUW is a broad application. I wouldn't be able to answer that definitively. Q. Do you know if underwriters use the CUW application? A. Chubb underwriters are employed by? A. Chubb underwriters are employed by Chubb. Q. Do you know if any legacy ACE underwriters used the CUW application? A. Could you be more specific with your question? Q. The CUW application existed before the merger, correct? A. Yes. Q. And before the merger, legacy Chubb underwriters, only, used the application, correct? A. I'm not sure they're the only people that  3	1	Support for ACE Processing"?	1	THE VIDEOGRAPHER: We're going off the
4 project?  A. Not that I recall. No.  Q. For the CUW application, is that application used by underwriters or agents? A. It's CUW is a broad application. I wouldn't be able to answer that definitively. Q. Do you know if underwriters use the CUW application? A. Yes. Q. And who were the underwriters employed by? A. Chubb underwriters are employed by Chubb. Q. Do you know if any legacy ACE underwriters used the CUW application? A. Could you be more specific with your question? A. Could you be more specific with your question? Q. The CUW application existed before the merger, correct? Q. And before the merger, legacy Chubb underwriters, only, used the application, correct? A. I'm not sure they're the only people that  4 THE VIDEOGRAPHER: We are back on the 5 record. This is the start to Media No. 3. The 6 time is 1:04. 7 BY MS. KLIEBENSTEIN: 8 Q. Mr. McCarthy, in connection with this case, 9 have you assisted in pulling any gross written 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 19 Q. Sure. Take your time. And I'm going to be 10 turning to page the bottom of page 5, top of 11 A. Yes. 12 Q. Prom what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 19 page 6. 20 A. (Reviewing document.) Okay. 21 A. (Reviewing document.) Okay. 22 Q. And looking at the bottom of page 5, top of 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	_	A NI.	_	1 771 1 11 50
5 A. Not that I recall. No. 6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 19 Q. Sure. Take your time. And I'm going to be 19 page 6. 20 And looking at the bottom of page 5, top of 21 A. Yes. 22 Q. And looking at the bottom of page 5, top of 23 Q. And looking at the bottom of page 5, top of 24 A. I'm not sure they're the only people that				
6 Q. For the CUW application, is that 7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 19 merger, correct? 20 And before the merger, legacy Chubb 21 and Yes. 22 Q. From what applications? 23 Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open. 24 A. Yes. 25 Q. And before the merger, legacy Chubb 26 underwriters, only, used the application, correct? 27 A. I'm not sure they're the only people that 28 Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written 29 have you assisted in pulling any gross written 20 premium figures? 21 A. Yes. 22 Q. From what applications? 23 Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open. 24 A. Yes. 25 Q. Sure. Take your time. And I'm going to be turning to page the bottom of page 5, top of page 6. 26 A. (Reviewing document.) Okay. 27 O. And looking at the bottom of page 5, top of page 6, the data that's on those pages, is that the	3	Q. Did you have any involvement in that	3	(A break was taken at 11:58 a.m.)
7 application used by underwriters or agents? 8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that  7 BY MS. KLIEBENSTEIN: 8 Q. Mr. McCarthy, in connection with this case, 9 have you assisted in pulling any gross written 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. Q. I've moved into the Marked Exhibits a 14 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 19 page 6. 20 And looking at the bottom of page 5, top of 21 A. Yes. 22 Q. And looking at the bottom of page 5, top of 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4	Q. Did you have any involvement in that project?	3 4	(A break was taken at 11:58 a.m.) THE VIDEOGRAPHER: We are back on the
8 A. It's CUW is a broad application. I 9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that	3 4 5	<ul><li>Q. Did you have any involvement in that project?</li><li>A. Not that I recall. No.</li></ul>	3 4 5	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The
9 wouldn't be able to answer that definitively. 10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 29 have you assisted in pulling any gross written 10 premium figures? 11 A. Yes. 12 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 20 turning to page the bottom of page 5, top of 21 A. Yes. 22 Q. And looking at the bottom of page 5, top of 23 Q. And looking at the bottom of page 5, top of 24 A. I'm not sure they're the only people that	3 4 5 6	<ul><li>Q. Did you have any involvement in that project?</li><li>A. Not that I recall. No.</li><li>Q. For the CUW application, is that</li></ul>	3 4 5 6	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.
10 Q. Do you know if underwriters use the CUW 11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 25 Q. And looking at the bottom of page 5, top of 26 Q. And looking at the bottom of page 5, top of 27 Q. And looking at the bottom of page 5, top of 28 Q. And looking at the bottom of page 5, top of 29 page 6, the data that's on those pages, is that the	3 4 5 6 7	<ul><li>Q. Did you have any involvement in that project?</li><li>A. Not that I recall. No.</li><li>Q. For the CUW application, is that application used by underwriters or agents?</li></ul>	3 4 5 6 7	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:
11 application? 12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 25 Q. And looking at the bottom of page 5, top of 26 Q. And looking at the bottom of page 5, top of 27 Q. And looking at the bottom of page 5, top of 28 Q. And looking at the bottom of page 5, top of 29 Q. And looking at the bottom of page 5, top of 20 page 6, the data that's on those pages, is that the	3 4 5 6 7 8	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I</li> </ul>	3 4 5 6 7 8	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case,
12 A. Yes. 13 Q. And who were the underwriters employed by? 14 A. Chubb underwriters are employed by Chubb. 15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. From what applications? 13 A. From IRMA, TAPS, and for CUW-IM. 14 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 page 6. 22 A. (Reviewing document.) Okay. 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 26 Q. From what applications? 18 A. From IRMA, TAPS, and for CUW-IM. 19 Q. I've moved into the Marked Exhibits a 15 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 page 6. 22 A. (Reviewing document.) Okay. 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> </ul>	3 4 5 6 7 8 9	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written
Q. And who were the underwriters employed by? A. Chubb underwriters are employed by Chubb. Q. Do you know if any legacy ACE underwriters used the CUW application?  A. Could you be more specific with your question?  Q. The CUW application existed before the merger, correct?  A. Yes.  Q. The CUW application existed before the underwriters  A. Yes.  Q. And before the merger, legacy Chubb  A. Yes.  Q. And before the merger, legacy Chubb  A. I'm not sure they're the only people that  A. From IRMA, TAPS, and for CUW-IM.  A. From IRMA, TAPS, and for CuW-ins.	3 4 5 6 7 8 9 10	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW</li> </ul>	3 4 5 6 7 8 9	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?
A. Chubb underwriters are employed by Chubb.  Q. Do you know if any legacy ACE underwriters 15 document titled Phillips 566. Let me know when you 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 26 Use moved into the Marked Exhibits a 27 document titled Phillips 566. Let me know when you 28 document titled Phillips 566. Let me know when you 29 have that open. 20 have that open. 21 PQ. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 page 6. 22 A. (Reviewing document.) Okay. 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> </ul>	3 4 5 6 7 8 9 10	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.
15 Q. Do you know if any legacy ACE underwriters 16 used the CUW application? 17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 25 document titled Phillips 566. Let me know when you 16 have that open. 17 A. I have it open. I'm just looking at it 18 quickly. 19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 page 6. 22 A. (Reviewing document.) Okay. 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> </ul>	3 4 5 6 7 8 9 10 11 12	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?
16 used the CUW application?  17 A. Could you be more specific with your  18 question?  19 Q. The CUW application existed before the  20 merger, correct?  20 turning to page the bottom of page 5, top of  21 A. Yes.  22 Q. And before the merger, legacy Chubb  23 underwriters, only, used the application, correct?  24 A. I'm not sure they're the only people that  16 have that open.  17 A. I have it open. I'm just looking at it  18 quickly.  19 Q. Sure. Take your time. And I'm going to be  20 turning to page the bottom of page 5, top of  21 page 6.  22 A. (Reviewing document.) Okay.  23 Q. And looking at the bottom of page 5, top of  24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> </ul>	3 4 5 6 7 8 9 10 11 12 13	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.
17 A. Could you be more specific with your 18 question? 19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 26 quickly. 27 Q. Sure. Take your time. And I'm going to be 28 turning to page the bottom of page 5, top of 29 A. (Reviewing document.) Okay. 20 Q. And looking at the bottom of page 5, top of 21 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a
18 quickly.  19 Q. The CUW application existed before the 20 merger, correct?  19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 A. Yes.  22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct?  24 A. I'm not sure they're the only people that  18 quickly.  19 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 page 6.  22 A. (Reviewing document.) Okay.  23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you
19 Q. The CUW application existed before the 20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 29 Q. Sure. Take your time. And I'm going to be 20 turning to page the bottom of page 5, top of 21 page 6. 22 A. (Reviewing document.) Okay. 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14 15 16	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.
20 merger, correct? 21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 25 turning to page the bottom of page 5, top of 26 A. (Reviewing document.) Okay. 27 Q. And looking at the bottom of page 5, top of 28 Q. And looking at the bottom of page 5, top of 29 Page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it
21 A. Yes. 22 Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 21 page 6. 22 A. (Reviewing document.) Okay. 23 Q. And looking at the bottom of page 5, top of 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.
Q. And before the merger, legacy Chubb 23 underwriters, only, used the application, correct? 24 A. I'm not sure they're the only people that 25 A. (Reviewing document.) Okay. 26 Q. And looking at the bottom of page 5, top of 27 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> <li>Q. The CUW application existed before the</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.  Q. Sure. Take your time. And I'm going to be
<ul> <li>underwriters, only, used the application, correct?</li> <li>A. I'm not sure they're the only people that</li> <li>Q. And looking at the bottom of page 5, top of</li> <li>page 6, the data that's on those pages, is that the</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> <li>Q. The CUW application existed before the merger, correct?</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.  Q. Sure. Take your time. And I'm going to be turning to page the bottom of page 5, top of
A. I'm not sure they're the only people that 24 page 6, the data that's on those pages, is that the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> <li>Q. The CUW application existed before the merger, correct?</li> <li>A. Yes.</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.  Q. Sure. Take your time. And I'm going to be turning to page the bottom of page 5, top of page 6.
	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> <li>Q. The CUW application existed before the merger, correct?</li> <li>A. Yes.</li> <li>Q. And before the merger, legacy Chubb</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.  Q. Sure. Take your time. And I'm going to be turning to page the bottom of page 5, top of page 6.  A. (Reviewing document.) Okay.
25 data that you helped to pull for the COW-HVI	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> <li>Q. The CUW application existed before the merger, correct?</li> <li>A. Yes.</li> <li>Q. And before the merger, legacy Chubb underwriters, only, used the application, correct?</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.  Q. Sure. Take your time. And I'm going to be turning to page the bottom of page 5, top of page 6.  A. (Reviewing document.) Okay.  Q. And looking at the bottom of page 5, top of
	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	<ul> <li>Q. Did you have any involvement in that project?</li> <li>A. Not that I recall. No.</li> <li>Q. For the CUW application, is that application used by underwriters or agents?</li> <li>A. It's CUW is a broad application. I wouldn't be able to answer that definitively.</li> <li>Q. Do you know if underwriters use the CUW application?</li> <li>A. Yes.</li> <li>Q. And who were the underwriters employed by?</li> <li>A. Chubb underwriters are employed by Chubb.</li> <li>Q. Do you know if any legacy ACE underwriters used the CUW application?</li> <li>A. Could you be more specific with your question?</li> <li>Q. The CUW application existed before the merger, correct?</li> <li>A. Yes.</li> <li>Q. And before the merger, legacy Chubb underwriters, only, used the application, correct?</li> <li>A. I'm not sure they're the only people that</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	(A break was taken at 11:58 a.m.)  THE VIDEOGRAPHER: We are back on the record. This is the start to Media No. 3. The time is 1:04.  BY MS. KLIEBENSTEIN:  Q. Mr. McCarthy, in connection with this case, have you assisted in pulling any gross written premium figures?  A. Yes.  Q. From what applications?  A. From IRMA, TAPS, and for CUW-IM.  Q. I've moved into the Marked Exhibits a document titled Phillips 566. Let me know when you have that open.  A. I have it open. I'm just looking at it quickly.  Q. Sure. Take your time. And I'm going to be turning to page the bottom of page 5, top of page 6.  A. (Reviewing document.) Okay.  Q. And looking at the bottom of page 5, top of page 6, the data that's on those pages, is that the

Page 62 Page 64 1 application? 1 the data, the policy counts and written premiums, A. Yes. 2 from 2017 and beyond more likely touched a business 3 Q. Can you explain for me what information is 3 rule in Blaze Advisor than the data from 2016? 4 reflected in each column at the top of page 6. A. In 2016, it's possible that a transaction A. Yeah. So we were asked to produce a report 5 associated with a policy had a business rule 6 by year and then by writing company. And then for 6 associated with it, but that transaction did not 7 each writing company, show the policy count and the 7 necessarily reflect the actual premium booking 8 written premium for that writing company by year. 8 processing. Q. And are those policy counts and written Q. And why not -- why did that transaction not 10 premiums in connection with which Blaze Advisor 10 necessarily reflect the actual premium booking 11 software was used? processing? 11 A. Not necessarily. 12 12 A. Because it may have been a subsequent 13 Q. If I look in the paragraph at the bottom of 13 transaction. 14 page 5, it says, "For the Chubb Commercial 14 Q. But that's not the case for the 2017 and 15 Insurance (CCI) business unit for the years 15 beyond data; is that right? 16 identified below (post-merger), the following A. It's much less likely that would be the 16 17 applications use Blaze Advisor software: CUW-IM, 17 case for 2017 and thereafter, yes. 18 TAPS, and IRMA. The approximate gross written 18 Q. And what I want to know is, what's 19 premiums, policy counts, and identification of the 19 different? What's different about the system, 20 insurance writing companies that issued insurance 20 2016, compared to 2017, that creates that result? 21 policies that used these applications, in 21 A. A transaction that took place in 2016 could 22 connection with which Blaze Advisor software was 22 have been for a policy that was still in force but used, is provided in the charts below for the years 23 23 that was booked in 2015. 24 requested." 24 Q. How did you go about gathering the data 25 So to confirm, the data that begins on the 25 that's reflected under the heading for "CUW-IM" in Page 63 Page 65 1 top of page 6, does that include policies and 1 this exhibit? 2 written premiums that did not touch Blaze Advisor 2 A. That's a very complicated question to 3 software? 3 answer. 4 A. Possibly. 4 Q. What were the steps you took to retrieve 5 Q. How do I know which policies did or did not the data that's under this heading? 6 touch Blaze Advisor software? A. So we used client data and a policy ID, and 7 A. For this extract, the premium in 2016 does 7 we associated that with premium data according to 8 this criteria: year and written company. 8 not necessarily reflect premium that had any association with a business rule. 9 Q. What type of client data? 10 Q. What about for 2017? 10 A. Client data that is part of CUW. A. With greater confidence, 2017 and 11 O. And how did you go about isolating policies 11 12 thereafter, it's more likely that the premium is 12 that touched CUW-IM? A. We pulled the data from a database. 13 associated with a business rule. 13 14 14 Q. And why is the data from 2016 different? Q. What database? 15 A. The way the request came in, as I recall, 15 A. Database associated with inventory 16 if any transaction occurred and it went to CUW-IM, 16 management and CUW. 17 we were to identify the premium associated with 17 Q. And there's a footnote at the bottom of 18 that policy. 18 this exhibit on page 6, and it says, "We understand 19 Q. Okay. That still doesn't explain to me why 19 that this financial information includes policies the data for 2016 is less likely to have touched a 20 that were brought in under a system that includes 21 business rule than the data from 2017 and beyond. 21 policies that are renewed using Blaze, but 22 Can you answer that question? 22 automatically at the same time includes the prior transaction involving the same policy regardless 23 23 A. I didn't -- if you could ask it as a

24

25

whether it uses Blaze."

A. Right.

25

24 question, because that wasn't a question.

Q. Why is the -- why is it more likely that

Page 66 Page 68 Q. Do you understand what that sentence means? 1 just to make sure I'm understanding you. 1 2 A. Yeah. That's what I was referring to Q. Can I tell from looking at the data on 3 earlier. 3 page 6 of 566 what policies were booked without use 4 of Blaze Advisor and then a subsequent transaction 4 O. So I'm not clear as to what that sentence 5 means. Could you give me -- could you give me an 5 in CUW-IM required use of a business rule from 6 example of this problem that's illustrated in 6 Blaze Advisor? 7 footnote 1? A. Can you tell? No. From the report you 8 A. Yeah. So if a policy was booked but then a 8 can't tell -- you can't discern that. 9 subsequent transaction required a business rule, we Q. I see Chubb Insurance Company of Canada 10 would have captured the premium from that original 10 listed as a writing company on page 6 of 11 policy when we pulled up this report, because of 11 Exhibit 566. Does that refresh your recollection 12 that subsequent transaction that had business rules 12 as to whether CUW-IM was used in Canada? 13 associated with it. 13 A. It doesn't refresh my memory. No. Q. And isolating on the phrase "subsequent 14 Q. And then moving down to the bottom of 14 15 transaction," what is a subsequent transaction? 15 page 7. Is this the data that you pulled for the 16 TAPS application? 16 Can you give me examples? A. Yes. 17 A. Could be a zero dollar endorsement of some 17 18 coverage that Chubb offers but we process that 18 Q. And the policies and the gross written 19 premiums reflected, those each touched Blaze 19 transaction as an endorsement. 20 Q. Any other examples come to mind? 20 Advisor; is that right? 21 A. A cancellation. Could be a number of 21 A. In this case, I believe so. 22 different things. 22 Q. Moving back to CUW, that application is 23 Q. Any other examples come to mind? 23 used by, in part -- well, sorry, let me ask that a A. I mean, I'm going to give you generic different way. 24 24 25 examples, but those are the types of things, you 25 Is the CUW application used by agents or Page 67 Page 69 1 know, that would be described as transactions. underwriters or both? Q. So we've got a zero dollar endorsement and 2 MR. FLEMING: Objection. That's been 2 3 a cancellation. Are there any other general types 3 asked and answered. 4 of subsequent transactions you can think of? 4 MS. KLIEBENSTEIN: Yeah. I just can't 5 A. A reinstatement of the policy. 5 recall the answer. Q. Anything else? A. Oh, okay. I can't recall -- I can't recall 6 7 A. I mean, there are a number of different 7 if it's used by agents. It is used by underwriters. I believe that was my answer before. types of transactions. Q. I understand --Q. And what about the TAPS application, is 10 A. But those -- yeah. 10 that used by agents or underwriters or somebody Q. I understand that --11 else? 11 12 A. So it --12 A. I believe it's an internal application. 13 MR. FLEMING: Wait, wait. Okay. So 13 I'm not sure, but I believe that's correct. Q. And underwriters -- the underwriters using 14 the pending question now is . . . 14 15 Q. Do you have any more examples? 15 the CUW-IM, the CUW application, are the A. I'm probably not the best person to provide underwriters employed by the writing companies 16 16 additional examples of transactions. 17 listed on pages 6 and 7 of Exhibit 566? 17 18 Q. So no additional examples come to mind? 18 MR. FLEMING: Objection. Lack of 19 A. Not at this time. 19 foundation. Q. Can I tell -- from looking at this data on 20 20 A. I would not know about that. 21 page 6 of Exhibit 566, can I tell what policies --21 Q. Moving to the IRMA data on page 8, is this 22 what policies were booked without use of Blaze 22 the data that you pulled for this lawsuit in 23 Advisor and then a subsequent transaction required 23 connection with the IRMA application? 24 a business rule from Blaze Advisor? 24 A. Yes. 25 25 A. Sorry. Just repeat the question again, Q. And does this reflect the policies and

	HIGHLI CONFIDENTIAL -		
	Page 70		Page 72
1	written premiums that touch Blaze Advisor in the	1	footnote that we saw in Exhibit 566.
2	IRMA application?	2	Do you know why that is?
3	A. Yes.	3	A. No.
4	Q. Are you familiar with the Evolution	4	Q. Do the policy counts
5	application in Canada?	5	A. Sorry. Sorry. I'm thinking about your
6	A. I'm not familiar with it. Could you ask	6	question more.
7	that differently?	7	Yeah, sorry. I'll stay with my answer.
8	Q. I don't was there something unclear	8	I'm not sure why there's not a footnote there.
9	about the question?	9	Q. Should it have the same footnote?
10	A. "Familiar." I've heard the name.	10	A. I'm thinking about it. Probably the answer
11	Q. Does the Evolution application fall under	11	to that is yes.
12	your umbrella of job responsibilities?	12	Q. And why do you say that?
13	A. No, they do not.	13	A. It would be the same scenario as the
14	Q. I've moved into the Marked Exhibit folder	14	previous data that we collected.
15	an exhibit entitled Harkin 407. Are you familiar	15	Q. Is there a way for me to identify which
16	with this exhibit?	16	gross written premiums are from a policy that was
17	A. Sorry. It's still loading.	17	booked that did not touch Blaze Advisor, but yet
18	Q. Oh. And I'd like to focus on the Answer to	18	were involved in a subsequent transaction that did
19	Interrogatory No. 16 in this Exhibit 407.	19	touch Blaze Advisor?
20	A. Just one second. It's having difficulty	20	A. Is there a way? Technically, I would think
21	loading. Which page are you on?	21	that there is a way to do it, yes.
22	Q. Going to start on page 6.	22	Q. But looking at this interrogatory answer, I
23	A. Okay. Okay. Yeah, okay.	23	cannot do that, correct?
24	Q. And so starting on page 6 through 8,	24	A. Not based on that information as it is.
25	there's policy counts and gross written premium	25	Q. Can you explain for me the technical way to
	Page 71		Page 73
1	figures for the CUW-IM application from years 2008	1	sort out those different buckets?
2	through 2012. And I'm wondering, did you pull that	2	A. I am not a data analyst, so I wouldn't feel
3	information?	3	comfortable answering that question.
4	A. No, I didn't.	4	Q. Moving on to page 8 of Exhibit 407. Did
5	Q. Do you know who did?	5	you collect the data for the IRMA application
6	A. Yes.	6	that's in this exhibit?
7	Q. Who?	7	A. No, I did not.
8	A. That's an engineer that works in my group.	8	Q. Did someone at your direction?
9	Q. And what was that engineer's name?	9	A. Yes.
10	A. Peter Muller.	10	Q. Who did that?
11	Q. Was he working at your request?	11	A. An engineer that works on my team.
12	A. Yes.	12	Q. And the same name as before?
13	Q. Do you know how he pulled this data? What	13	A. Pete Peter Muller. Yes.
14	steps did he take?	14	Q. And do you know, how did he go about
15	A. So the request the way the request was	15	retrieving this data? What steps did he take?
16	made, we pulled policies and associated them with	16	A. For IRMA?
17	the writing company by year, and their written	17	Q. Yes.
18	premium from two different sources.	18	A. There's a database associated directly with
19	Q. And what are those two different sources?	19	the application, and he pulled that data from the
20	A. One would have been from a database from	20	production maintenance.
1	CUW. And for some of the policies, we would have	21	Q. And the written premium dollars and the
21	±	22	policy counts, each touched Blaze Advisor in the
21 22	pulled premium from Genius, which is a different	22	policy counts, each touched blaze havisor in the
	pulled premium from Genius, which is a different system.	23	
22	pulled premium from Genius, which is a different system.  Q. Now, I notice the data associated with		IRMA application?  A. That was the basis for creating the report.
22 23	system.	23	IRMA application?

	Page 74		Page 76
1	that the CUW gross written premium data that we	1	My question was: Did you agree with this
2	just looked at captured included policies that	2	statement, where Chubb's damages expert wrote, "The
3	were captured multiple times in the data for other	3	CUW gross written premium data relied upon included
4	applications, such as CSI Express and Premium	4	policies that were captured multiple times in the
5	Bookings.	5	data for other applications such as CSI Express and
6	Do you agree with that statement?	6	Premium Bookings"?
7	A. I don't know who the damage expert is. At	7	Earlier you answered yes and no to that
8	least I don't recall. But I would say that	8	question, and I want to know why you answered no,
9	that's I'm sorry. For which applications were	9	in part.
10	you talking about just now?	10	A. No, in the sense that it was my
11	Q. I'll read it for I'll read the statement	11	understanding that CSI Express was using Inventory
12	for you again.	12	Management, and recently I learned that it was not
13	A. Okay.	13	using CSI Express for its assignment of or for
14	Q. This is what the this is what Chubb's	14	its business rules.
15	damages expert wrote in his report. He wrote, "The	15	So in CSI Express, the answer would be no.
16	CUW gross written premium data relied upon included	16	Q. So there was a use of the word "it" in your
17	policies that were captured multiple times in the	17	answer that confuses me. So are you saying that
18	data for other applications such as CSI Express and	18	CSI Express does not use CUW-IM for its assignment
19	Premium Bookings."	19	of business rules?
20	And my question is: Do you agree with that	20	A. That's correct.
21	statement?	21	Q. And did it at one time did CSI Express
22	A. I can answer that yes and no.	22	at one time use the CUW-IM application for
23	Q. Why do you answer that question yes?	23	assignment of business rules?
24	A. Well, because for some applications we	24	A. Not to my knowledge right now.
25	know, or we believe, that the premium and the	25	Q. So I moved to the Marked Exhibits folder an
	Page 75		Page 77
	1480 / 5		Page 77
1	reports would also appear in the CUW-IM.	1	exhibit titled Bakewell 525.
1 2	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the	2	exhibit titled Bakewell 525. A. Okay.
1 2 3	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the	2 3	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and
	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and	2 3 4	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's
3	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?	2 3 4 5	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.
3 4	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.	2 3 4	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM"
3 4 5 6 7	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No. Q. How did I get that wrong?	2 3 4 5 6 7	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of
3 4 5 6 7 8	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.	2 3 4 5 6 7 8	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.
3 4 5 6 7 8 9	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?	2 3 4 5 6 7 8 9	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm.
3 4 5 6 7 8 9	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was	2 3 4 5 6 7 8 9	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in
3 4 5 6 7 8 9 10	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.	2 3 4 5 6 7 8 9 10	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm.  Q. Are you familiar with this the data in this file?
3 4 5 6 7 8 9 10 11 12	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?	2 3 4 5 6 7 8 9 10 11 12	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm.  Q. Are you familiar with this the data in this file?  A. No, I'm not.
3 4 5 6 7 8 9 10 11 12 13	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express	2 3 4 5 6 7 8 9 10 11 12 13	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this
3 4 5 6 7 8 9 10 11 12 13 14	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for	2 3 4 5 6 7 8 9 10 11 12 13 14	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that
3 4 5 6 7 8 9 10 11 12 13 14 15	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and
3 4 5 6 7 8 9 10 11 12 13 14 15 16	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document. So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file. A. Mm-hmm. Q. Are you familiar with this the data in this file? A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we saw in footnote 1?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document. So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file. A. Mm-hmm. Q. Are you familiar with this the data in this file? A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection? A. No.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we saw in footnote 1?  A. That's I think that's separate. That's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document. So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file. A. Mm-hmm. Q. Are you familiar with this the data in this file? A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection? A. No. Q. Were you asked after you pulled the data
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we saw in footnote 1?  A. That's I think that's separate. That's a separate issue.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	exhibit titled Bakewell 525.  A. Okay.  Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm.  Q. Are you familiar with this the data in this file?  A. No, I'm not.  Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection?  A. No.  Q. Were you asked after you pulled the data that was reflected in the interrogatory responses
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we saw in footnote 1?  A. That's I think that's separate. That's a separate issue.  Q. It's a separate issue.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection?  A. No. Q. Were you asked after you pulled the data that was reflected in the interrogatory responses that we just looked at, were you asked to revise
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we saw in footnote 1?  A. That's I think that's separate. That's a separate issue.  Q. It's a separate issue.  So going back up to your yes and no answer,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection? A. No. Q. Were you asked after you pulled the data that was reflected in the interrogatory responses that we just looked at, were you asked to revise and repull the data on policies and gross written
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	reports would also appear in the CUW-IM.  Q. So, for example, are you saying that in the CSI Express application, the premium and the premiums are showing up in both the CSI Express and the CUW-IM reports?  A. No. No.  Q. How did I get that wrong?  A. Not in that case.  Q. So how did I get that wrong?  A. I'm not sure when that information was captured.  Q. When what information was captured?  A. What you just told me, that the CSI Express premium was double counting the premiums for CUW-IM.  Q. So this concern of capturing data multiple times in different application reports, is that the same concern or a different concern than what we saw in footnote 1?  A. That's I think that's separate. That's a separate issue.  Q. It's a separate issue.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	exhibit titled Bakewell 525.  A. Okay. Q. Let me know when you've had it open and you're ready for questions. And you can there's a zoom feature to look closer at the document.  So this was produced to us titled "Blaze IM Extract Final." This is simply one page of possibly a 10,000-page text file.  A. Mm-hmm. Q. Are you familiar with this the data in this file?  A. No, I'm not. Q. Chubb's damages expert characterized this document as the gross written premium data that removes policies that ran through both CUW and another application, specifically CSI Express and Premium Booking.  Does that help refresh your recollection?  A. No. Q. Were you asked after you pulled the data that was reflected in the interrogatory responses that we just looked at, were you asked to revise

## CASE 0:16-cv-01054-DTS Doc. 820 Filed 10/28/20 Page 8 of 9

1	Page 78		Page 80
1	Q. Mr. McCarthy, did you hear my question?	1	THE WITNESS: Well
2	MS. KLIEBENSTEIN: Can anybody hear me?	2	MR. FLEMING: Just one second, Chase.
3	Terry, can you hear me?	3	Do you hear me?
4	MR. FLEMING: I can hear you.	4	THE WITNESS: Yeah, yeah, I hear you.
5	MR. YOUNG: I can hear you.	5	MR. FLEMING: Okay. To the extent that
6	MS. KLIEBENSTEIN: Can Chase hear me?	6	communication was with Chris Bakewell and counsel,
7	No? I'm confused. Mr. McCarthy?	7	I will direct you not to answer on the grounds of
8	(Technical interruption.)	8	attorney-client work product privilege.
9	THE VIDEOGRAPHER: We're going off the	9	MS. KLIEBENSTEIN: Well, the trouble
10	record. The time now is 1:50.	10	with that is Mr. Bakewell cites conversations with
11	(A break was taken at 1:50 p.m.)	11	Mr. McCarthy as support that he's relied on, and
12	THE VIDEOGRAPHER: We are back on the	12	that can't be shielded from discovery.
13	record. The time now is 1:51.	13	MR. FLEMING: Yeah, that's fair enough.
14	BY MS. KLIEBENSTEIN:	14	Didn't Chase already answer the question? I don't
15	Q. All right. My last question, Mr. McCarthy,	15	have the text up here that I'm going to stream.
16	was: After you pulled the data reflected in the	16	Merilee, would you mind stating reading
17	interrogatory responses we just looked at, were you	17	the answer that Mr. McCarthy gave.
18	reasked were you asked to revise and repull that	18	(The preceding portion was read back as
19	data for policies and gross written premium for the	19	follows:
20	CUW-IM application?	20	"QUESTION: Do you recall speaking with
21	A. Yes.	21	Chubb's damages expert who's working on
22	Q. And do you know one way or the other	22	this case?
23	whether that data that you repulled is shown in	23	ANSWER: I may have through your
24	Bakewell Exhibit 525?	24	prompting and by the question, I think I
25	A. I'm trying to recall this, because I think	25	may have had a conversation. I just
	Page 79		Page 81
1	that there were two reports and I'm just not sure	1	it's not a clear memory. But I can imagine
2	which one of those would be in this exhibit that	2	I would have spoken with someone like
3	you're talking about right now.	_	•
1 3		3	that.")
4	The Bakewell 5 oh, no, the Bakewell 525,	3	that.") MS. KLIEBENSTEIN:
	The Bakewell 5 oh, no, the Bakewell 525,		MS. KLIEBENSTEIN:
4		4	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall
4 5	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right	4 5	MS. KLIEBENSTEIN:
4 5 6	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?	4 5 6	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation?
4 5 6 7	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us,	4 5 6 7	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no.
4 5 6 7 8	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."	4 5 6 7 8	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced
4 5 6 7 8 9	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.	4 5 6 7 8 9	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in
4 5 6 7 8 9	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text	4 5 6 7 8 9	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward -
4 5 6 7 8 9 10	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.	4 5 6 7 8 9 10	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward -FICO Notice of Termination Chubb Blaze"?
4 5 6 7 8 9 10 11 12	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.	4 5 6 7 8 9 10 11 12	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"? A. I don't recall that email.
4 5 6 7 8 9 10 11 12 13	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?	4 5 6 7 8 9 10 11 12 13	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"? A. I don't recall that email. Q. Do you know why you would have received
4 5 6 7 8 9 10 11 12 13	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document. Q. It was produced to us as a very large text file.  A. No. Q. Does that refresh your recollection? A. No. I don't recall this document.	4 5 6 7 8 9 10 11 12 13 14	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license
4 5 6 7 8 9 10 11 12 13 14 15	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages	4 5 6 7 8 9 10 11 12 13 14 15	MS. KLIEBENSTEIN: Q. And then my follow-up was: Do you recall any parts of that conversation? A. No. Not really, no. Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"? A. I don't recall that email. Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?
4 5 6 7 8 9 10 11 12 13 14 15 16	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?	4 5 6 7 8 9 10 11 12 13 14 15 16	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of
4 5 6 7 8 9 10 11 12 13 14 15 16	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by	4 5 6 7 8 9 10 11 12 13 14 15 16 17	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by the question, I think I may have had a	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.  A. I would say it probably had to do with work
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by the question, I think I may have had a conversation. I just it's not a clear memory.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.  A. I would say it probably had to do with work that we were doing with Specialty Insurance.
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by the question, I think I may have had a conversation. I just it's not a clear memory.  But I can imagine I would have spoken with someone	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.  A. I would say it probably had to do with work that we were doing with Specialty Insurance.  Q. And what work was that?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by the question, I think I may have had a conversation. I just it's not a clear memory.  But I can imagine I would have spoken with someone like that.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.  A. I would say it probably had to do with work that we were doing with Specialty Insurance.  Q. And what work was that?  A. We were working on CSI Express.  Q. What work were you doing on CSI Express?  A. We were looking to move it over to a legacy
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by the question, I think I may have had a conversation. I just it's not a clear memory.  But I can imagine I would have spoken with someone like that.  Q. Do you recall any parts of that	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.  A. I would say it probably had to do with work that we were doing with Specialty Insurance.  Q. And what work was that?  A. We were working on CSI Express.  Q. What work were you doing on CSI Express?  A. We were looking to move it over to a legacy ACE platform for the business.
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	The Bakewell 5 oh, no, the Bakewell 525, is that the one that you're talking about right now?  Q. Yes. And it when it was produced to us, it was entitled "Blaze IM Extract Final."  A. Okay. I'm not familiar with this document.  Q. It was produced to us as a very large text file.  A. No.  Q. Does that refresh your recollection?  A. No. I don't recall this document.  Q. Do you recall speaking with Chubb's damages expert who's working on this case?  A. I may have through your prompting and by the question, I think I may have had a conversation. I just it's not a clear memory.  But I can imagine I would have spoken with someone like that.  Q. Do you recall any parts of that conversation?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MS. KLIEBENSTEIN:  Q. And then my follow-up was: Do you recall any parts of that conversation?  A. No. Not really, no.  Q. Mr. McCarthy, I've marked and introduced Exhibit 574. Do you recall receiving an email in April of 2016 from Ramesh Pandey titled "Forward-FICO Notice of Termination Chubb Blaze"?  A. I don't recall that email.  Q. Do you know why you would have received FICO's notice of termination of the Blaze license in 2016?  MR. FLEMING: I'll object. Lack of foundation.  A. I would say it probably had to do with work that we were doing with Specialty Insurance.  Q. And what work was that?  A. We were working on CSI Express.  Q. What work were you doing on CSI Express?  A. We were looking to move it over to a legacy

		7 1 1	
	Page 82	1	Page 84
	to a legacy ACE platform?	1	record. The time now is 2:04.
2	A. I'm not the best person to answer that	2	(A break was taken at 2:04 p.m.)
3	because I moved off of that project shortly	3	THE VIDEOGRAPHER: We are back on the
4	after around that date.	4	record. This is the start to Media No. 4. The
5	Q. Who would know the answer to that question?	5	time is 2:19 p.m.
6	A. Ramesh. Ramesh Pandey would probably know	6	BY MS. KLIEBENSTEIN:
7	the answer.	7	Q. Mr. McCarthy, can you go in the Marked
8	Q. And why was why was why were you part	8	Exhibits folder and pull up Exhibit 176?
9	of a group strike that.	9	A. Sure. (Reviewing document.)
10	Why was the company trying to move CSI	10	Q. So in this exhibit there's a two-page
11	Express to a legacy ACE platform?	11	email, along with an attachment behind it.
12	A. Because it had been selected as our target	12	A. Okay.
13	platform for that business unit under the new	13	Q. Do you recall receiving this email?
14	Chubb.	14	A. I'm just having a look at it just now.
15	Q. And why did you move off of that project?	15	(Reviewing document.) Okay.
16	A. At that time I took on a new role under	16	MR. FLEMING: Wait. I don't know if
17	Mike Butler as the chief architect for PRS.	17	there's a pending question or not.
18	Q. And PRS stands for what again?	18	Q. Yes. It was: Do you recall receiving this
19	A. Personal risk services.	19	email?
20	Q. Back in 2016 when you were working with	20	A. Right. I'm just looking. I'm trying to
21	CSI Express, do you know, did CSI Express interface	21	recall Duff & Phelps rings a bell. I can't
22	with the CUW application at all?	22	remember exactly in what context this email was
23	A. So I would not have been able to answer	23	sent. So I don't have clear recollection of the
24	that question at that time. I wasn't aware.	24	email.
25	Q. Can you answer that question today?	25	Q. The attachment is entitled "ACE Chubb
	Page 83		Page 85
1	A. Yeah.	_	Valuation_December 2015." Did you have any role in
2	<ul><li>A. Yeah.</li><li>Q. And what's the answer today?</li></ul>	2	Valuation_December 2015." Did you have any role in creating the attachment?
2	<ul><li>A. Yeah.</li><li>Q. And what's the answer today?</li><li>A. So CSI Express does not interface with</li></ul>	3	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I
2 3 4	<ul><li>A. Yeah.</li><li>Q. And what's the answer today?</li><li>A. So CSI Express does not interface with</li><li>CUW-Inventory Management for assignment.</li></ul>	2 3 4	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.
2 3 4 5	<ul> <li>A. Yeah.</li> <li>Q. And what's the answer today?</li> <li>A. So CSI Express does not interface with</li> <li>CUW-Inventory Management for assignment.</li> <li>Q. Has CSI Express ever interfaced with</li> </ul>	2 3 4 5	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?
2 3 4	<ul> <li>A. Yeah.</li> <li>Q. And what's the answer today?</li> <li>A. So CSI Express does not interface with</li> <li>CUW-Inventory Management for assignment.</li> <li>Q. Has CSI Express ever interfaced with</li> <li>CUW-IM?</li> </ul>	2 3 4	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I
2 3 4 5 6 7	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that.	2 3 4 5 6 7	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.
2 3 4 5 6 7 8	<ul> <li>A. Yeah.</li> <li>Q. And what's the answer today?</li> <li>A. So CSI Express does not interface with</li> <li>CUW-Inventory Management for assignment.</li> <li>Q. Has CSI Express ever interfaced with</li> <li>CUW-IM?</li> <li>A. I'm not the best person to answer that.</li> <li>Q. So you don't know, one way or the other?</li> </ul>	2 3 4 5 6 7 8	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the
2 3 4 5 6 7 8 9	<ul> <li>A. Yeah.</li> <li>Q. And what's the answer today?</li> <li>A. So CSI Express does not interface with</li> <li>CUW-Inventory Management for assignment.</li> <li>Q. Has CSI Express ever interfaced with</li> <li>CUW-IM?</li> <li>A. I'm not the best person to answer that.</li> <li>Q. So you don't know, one way or the other?</li> <li>A. Not definitively.</li> </ul>	2 3 4 5 6 7 8 9	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and
2 3 4 5 6 7 8 9	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW?	2 3 4 5 6 7 8 9	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?
2 3 4 5 6 7 8 9 10	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes.	2 3 4 5 6 7 8 9 10	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively
2 3 4 5 6 7 8 9 10 11 12	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the	2 3 4 5 6 7 8 9 10 11 12	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.
2 3 4 5 6 7 8 9 10 11 12 13	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced	2 3 4 5 6 7 8 9 10 11 12 13	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the
2 3 4 5 6 7 8 9 10 11 12 13 14	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask?	2 3 4 5 6 7 8 9 10 11 12 13 14	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person. Q. What about Henry Mirolyuz?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire document; page 2 of the attachment.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person. Q. What about Henry Mirolyuz? A. I don't know if he could answer that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire document; page 2 of the attachment.  A. All right. Yes, I see it. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person. Q. What about Henry Mirolyuz? A. I don't know if he could answer that question or not.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire document; page 2 of the attachment.  A. All right. Yes, I see it. Yes.  Q. And product name CUW, the description of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person. Q. What about Henry Mirolyuz? A. I don't know if he could answer that question or not. MR. FLEMING: Heather, we've been going	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire document; page 2 of the attachment.  A. All right. Yes, I see it. Yes.  Q. And product name CUW, the description of use states, "The Commercial Underwriting
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person. Q. What about Henry Mirolyuz? A. I don't know if he could answer that question or not.  MR. FLEMING: Heather, we've been going about an hour. Can we take a short break?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire document; page 2 of the attachment.  A. All right. Yes, I see it. Yes.  Q. And product name CUW, the description of use states, "The Commercial Underwriting Workstation provides an electronic environment to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yeah. Q. And what's the answer today? A. So CSI Express does not interface with CUW-Inventory Management for assignment. Q. Has CSI Express ever interfaced with CUW-IM? A. I'm not the best person to answer that. Q. So you don't know, one way or the other? A. Not definitively. Q. Does CSI Express interface with CUW? A. Yes. Q. If I wanted to find out the answer to the question whether CSI Express has ever interfaced with CUW-IM, who would I ask? A. Someone under the probably the best person would be someone in the architecture group that was assigned to that area. And Ramesh Pandey, for example, would be such a person. Q. What about Henry Mirolyuz? A. I don't know if he could answer that question or not. MR. FLEMING: Heather, we've been going	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Valuation_December 2015." Did you have any role in creating the attachment?  A. Based on the content I mean, I can I don't recall having direct input on this document.  Q. Do you know what this document is?  A. If you do and you described it to me, I might be able to recall.  Q. In the upper left-hand corner, I see the phrase "Business Application Inventory and Assessment." Does that refresh your recollection?  A. I see that. I can't tell you definitively what this document is for.  Q. Can you move to the second page of the attachment. At the top, there's a row with the product name CUW.  Do you see that?  A. On the second page?  Q. Correct. It's page 5 of the entire document; page 2 of the attachment.  A. All right. Yes, I see it. Yes.  Q. And product name CUW, the description of use states, "The Commercial Underwriting